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September 7, 2023

Hon. Lois Bloom
United States Magistrate Judge
United States District Court
Eastern District of New York
VIA ECF

Re: T.K. v. [REDACTED]
Case No.: 23 cv 5441(ARR)(LB)

Dear Judge Bloom:

I am attorney of record for defendant in the above matter. This letter serves as a stipulated and consented to motion to extend [REDACTED] time to respond to the complaint and to respond to plaintiff's motion for leave to proceed anonymously.

Defendant's answer was due on August 24, 2023. No prior request for a similar extension has been made. The extension is needed as I am endeavoring to obtain insurance coverage for [REDACTED] on this claim. I have spoken with the appropriate carrier's adjuster and have been told that the carrier will at least provide representation at this point and will make a full determination on coverage shortly hereafter. I have conferred with Daniel Szalkiewicz, plaintiff's counsel, and he has consented to extending [REDACTED] time to respond to both documents up to and including September 29, 2023. A stipulation to that effect is attached as an exhibit to this letter. I ask that either the stipulation or this letter be endorsed by the Court.

Thank you for your attention in this matter.

Sincerely,

s/Oscar Michelen

OSCAR MICHELEN

OM:sjk